

THE LAW OFFICE OF GREGORY JAVARDIAN, LLC

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Attorney for Citizens Bank Pennsylvania

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTEN DISTRICT OF PENNSYLVANIA

IN RE:

Mohammad A. Chughtai

Farzana A. Chughtai

Debtor(s)

Chapter 13 Proceeding

15-17133 ELF

**CITIZENS BANK PENNSYLVANIA’S (Second Mortgage Lien) OBJECTION TO
TRUSTEE’S MOTION TO SELL REAL PROPERTY**

AND NOW, comes Citizens Bank Pennsylvania(Respondent) by and through its counsel, Mary F. Kennedy, and hereby Objects to the Trustee’s Motion to Sell Real Property (“Motion to Sell”) and avers the following.

1. Respondent holds a second mortgage on the Debtors’ property located at 3860 Mettler Lane, Huntingdon Valley, PA 19006, referred to as the “property.”
2. Respondent’s mortgage was recorded on April 23,2009 in the Montgomery County Recorder of Deeds Office in book 12589 page 1028.
3. Respondent has been in contact with the Trustee to negotiate a short sale of its second mortgage lien.
4. As of the date of the filing of this Answer, Respondent has not seen a final Closing Disclosure Statement. Respondent has been advised that the Trustee is waiting for updated payoffs for the taxes. Respondent cannot consent to the short sale and the Motion to Sell the property until it reviews the final Closing Disclosure Statement.

WHEREFORE, Respondent respectfully request the Honorable Court ORDER:

That the Trustee's Motion to Sell the property located at 3860 Mettler Lane, Huntingdon Valley, PA 19006 is DENIED

RESPECTFULLY SUBMITTED,

THE LAW OFFICE OF GREGORY JAVARDIAN, LLC

By: /s/ Mary F. Kennedy, Esquire

Date: 6/9/2017